

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATHLEEN GIBSON, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

THE QUAKER OATS COMPANY,

Defendant.

Case No. 16-cv-04853

The Honorable Charles Norgle

**UNOPPOSED MOTION TO CONSOLIDATE AND
APPOINT INTERIM CLASS COUNSEL**

Plaintiffs in several pending actions that have been proposed for transfer to this Court (collectively, the “Quaker Actions”)¹ respectfully file this motion seeking an order consolidating the above actions and appointing Kim E. Richman, Beth E. Terrell, and John W. Barrett as Interim Co-Lead Counsel and Edward A. Wallace as Interim Liaison Counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure. Counsel for Defendant The Quaker Oats Company (“Quaker”) does not oppose the relief sought in this motion. The reasons for this motion are set forth in the accompanying memorandum of law.

Dated: July 6, 2016

Respectfully submitted,

By: /s/ Edward A. Wallace

¹ *Cooper v. The Quaker Oats Company*, No. 16-cv-02364 (filed Apr. 29, 2016, N.D. Cal.); *Daly v. The Quaker Oats Company*, No. 16-cv-02155 (filed Apr. 29, 2016, E.D.N.Y.); *Gibson v. The Quaker Oats Company*, No. 16-cv-04853 (filed May 2, 2016, N.D. Ill.); and *Jaffee v. The Quaker Oats Company*, No. 16-cv-21576 (filed May 3, 2016, S.D. Fla.). The parties filed stipulations to transfer the *Cooper*, *Daly*, and *Jaffee* actions to this Court. Upon transfer, Plaintiffs respectfully ask that the Court consolidate the actions.

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Counsel for Plaintiffs and the Putative Classes

CERTIFICATE OF SERVICE

I, Edward A. Wallace, hereby certify that a copy of the foregoing was filed using this Court's CM/ECF service, which will send notification of such filing to all counsel of record on July 6, 2016.

By: /s/ Edward A. Wallace
Edward A. Wallace